

September 9, 1998

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical and it is presented here exactly as submitted.

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ASm

14/6PP #34/36



April 9, 1996

**NALED REREGISTRATION:
SUPPORTING DOCUMENTATION FOR
NALED AQUATIC EXPOSURE MODELING**

Case No.:	0092 Naled
EPA Chemical No.:	034401
EPA Company No.:	59639

Ms. Susan Jennings
Office of Pesticide Programs, H7504C
Document Processing Desk: DCI-SRRD-0092
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

RECEIVED

JUL 29 1996
EPA PUBLIC DOCKET

Dear Ms. Jennings:

As promised at our meeting of March 12, 1996, Valent is providing attached a diskette with PRZM 2 and EXAMSII input files used to generate aquatic exposure modeling simulations detailed in the report entitled "Probabilistic Modeling of Naled Exposure to Aquatic NonTarget Organisms (DIBROM®)", which was submitted to EPA on June 9, 1995. We are also providing results and electronic input files for a new modeling simulation demonstrating the impact of proposed runoff mitigation label language. Please see the April 5 cover letter and attachments from Waterborne Environmental, Inc. for a full explanation of the information provided.

The modeling simulations performed and submitted last year included a procedure preventing naled applications from occurring on the same day as rainfall events. This was intended to represent proposed best management practice label language aimed at reducing runoff from treated fields. At our meeting on March 12, some EFED representatives expressed doubt that such a change would significantly reduce aquatic EEC's. In response, we have requested Waterborne to repeat the worst case simulation using PRZM 2.3 and input parameters identical to those used previously, except *without* prohibiting same day application/rainfall. The results of this additional simulation, detailed in Attachment 1 to Waterborne's cover letter, confirm our position that EEC's are substantially reduced with prohibition of same day application/rainfall. We believe these results are quite predictable given the extremely short half-life of naled. A description of the procedure used in the original simulations to prevent same day application/rainfall, is provided in Attachment 2. Upper 10th percentile EEC's with/without the

bcc: S.J. Gowanlock
J.L. Powell w/o attachments
D.A. Wustner
Washington D.C. office w/ attachments
Files w/ attachment incl. diskette

procedural correction are summarized in the following table:

Simulation Scenario	Aquatic Exposure Concentrations (ppb)		
	Instantaneous	Acute (96-hour)	Chronic (21-day)
Correction made to PRZM 2.3 input file to prohibit same day application and rainfall	3.67	1.30	0.45
No correction made to PRZM 2.3 input file to prohibit same day application and rainfall	19.58	5.90	1.28

Please provide copies of the attached documentation to appropriate EFED reviewers. If you or they have any questions, please call me at (510) 256-2770, or Brent Solomon at our Washington, D.C. office (202) 872-4682.

Sincerely,

Daniel P. Fay

Daniel P. Fay
Project Manager
Registration & Regulatory Affairs

Attachments (including one diskette)